

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA Division

In Re:

KIA R. YOUNGER

Debtor

Case No. 18-14086-KHK
Chapter 13

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RESPONSE TO OBJECTIONS TO CONFIRMATION

COMES NOW your Debtor, Kia R. Younger, by Counsel, and in response to the Objections To Confirmation of the Plan filed in this matter, states as follows:

1. The Debtor acknowledges that she has been unable to maintain all of her post-petition obligations and has determined that she should sell the residential real estate which should provide more than enough funding to complete her 100% Plan, and therefore, she intends to file a modified Plan providing for sale of the property with Court approval of the sale and disbursements.
2. The Debtor does not oppose the objection to confirmation [Doc No: 31], provided the Debtor is given the opportunity to file a Modified Plan resolve the objections.

WHEREFORE, having responded, your Debtor requests that confirmation be denied, and the Debtor be granted leave to file a Modified Plan.

KIA R. YOUNGER
By Counsel

/s/Earl J. Oberbauer, Jr.
Earl J. Oberbauer, Jr. Esquire
VA Bar #14657
9329 Battle Street
Manassas, Virginia 20110
(703) 368-7679
Counsel for Debtor

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of April, 2019, a true copy of the foregoing RESPONSE was sent electronically via CM/ECF to the Chapter 13 Trustee.

/s/Earl J. Oberbauer, Jr.
Earl J. Oberbauer, Jr. Esquire